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**Alpine, Mother Lode, San Joaquin
Emergency Medical Services Agency**

RECEIVED

April 15, 1993

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FCC MAIL ROOM

Ms. Donna Searcy, Secretary
Federal Communications Commission
1919 M Street NW, Room 222
Washington, DC. 20554

RE: **PR DOCKET 92-235**

Dear Ms. Searcy:

I am writing to express concerns about the "Refarming Docket" currently being proposed by the Federal Communications Commission. This Agency is charged with regulating Emergency Medical Services within a seven county region. Radio communication is a vital part of emergency medical care, and this proposed document would effect our hospital and providers operations greatly.

I offer the following comments:

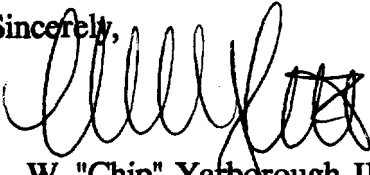
1. Reduction in power could in many instances reduce coverage below acceptable limits. Our system spans over several counties, which includes mountains, and areas such as the Yosemite National Forrest.
2. Reduction in modulation will also degrade system performance by lowering the signal to noise ratio.
3. Most, if not all of the older equipment, which most of our users have, could not be modified to meet the technical standards, and replacement would be necessary before useful life cycle is reached. This would be an tremendous cost for several of our non-profit, volunteer and governmental agencies.

"Refarming Document" Cont'd
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5. Proposals to eliminate service blocks and make all services eligible on all channels will require a vast amount of change in the frequency coordination process to protect all users and ensure effective spectrum utilization. The elimination of all service block assignments and all state only assignments is a dangerous proposal.
6. This proposal would drastically reduce the current channel bandwidth.

These proposals, if adopted in full, would mean a severe financial burden on this Agency and the providers in which we regulate. Thank you for the opportunity to express our concerns and if you have any questions, please call at (209) 529-5085.

Sincerely,



L. W. "Chip" Yarborough II
Communications Coordinator

cc: Ray Jester
Executive Director